

EXHIBIT 7

From: [Jeremy Anapol](#)
To: [Peter Tong](#)
Cc: [rak_virtamove@raklaw.com](#); [Amazon-VirtaMove](#); [Harper Estes](#)
Subject: RE: VirtaMove v. Amazon - Stipulation Regarding Venue Depositions
Date: Tuesday, October 15, 2024 10:41:38 AM

Peter,

Thanks for confirming. Based on this agreement, Amazon will not take the depositions of Woodward, Colford, and Huffman in connection with their venue declarations. Amazon may still seek their depositions during merits discovery.

Jeremy Anapol

Partner

949-721-2806 Direct

Knobbe Martens

From: Peter Tong <ptong@raklaw.com>

Sent: Tuesday, October 15, 2024 10:38 AM

To: Jeremy Anapol <Jeremy.Anapol@knobbe.com>

Cc: [rak_virtamove@raklaw.com](#); [Amazon-VirtaMove](#) <Amazon-VirtaMove@knobbe.com>; Harper Estes <hestes@lcalawfirm.com>

Subject: Re: VirtaMove v. Amazon - Stipulation Regarding Venue Depositions

Yes, this applies across Woodward, Colford, and Huffman.

Peter Tong

Russ, August & Kabat

4925 Greenville Avenue, Suite 200 | Dallas, Texas 75206

Main +1 310 826 7474 | ptong@raklaw.com | www.raklaw.com

From: Jeremy Anapol <Jeremy.Anapol@knobbe.com>

Date: Tuesday, October 15, 2024 at 12:36 PM

To: Peter Tong <ptong@raklaw.com>

Cc: ["rak_virtamove@raklaw.com"](#) <rak_virtamove@raklaw.com>, [Amazon-VirtaMove](#) <Amazon-VirtaMove@knobbe.com>, Harper Estes <hestes@lcalawfirm.com>

Subject: RE: VirtaMove v. Amazon - Stipulation Regarding Venue Depositions

Peter,

Thanks for the explanation. Your email below agrees “that the responses that O’Leary gave for any venue issue (e.g., relevance at trial, travel) are representative of the types of responses that Woodward would give, such that the Court should treat them the same for venue issues.” Is VirtaMove agreeing that O’Leary is representative in the same way for Huffman and Colford also?

Jeremy Anapol

Partner

949-721-2806 Direct

Knobbe Martens

From: Peter Tong <ptong@raklaw.com>

Sent: Tuesday, October 15, 2024 9:49 AM

To: Jeremy Anapol <Jeremy.Anapol@knobbe.com>

Cc: rak_virtamove@raklaw.com; Amazon-VirtaMove <Amazon-VirtaMove@knobbe.com>; Harper Estes <hestes@lcalawfirm.com>

Subject: Re: VirtaMove v. Amazon - Stipulation Regarding Venue Depositions

Hi Jeremy,

The declarations have different facts that are obvious on their face. For example, O'Leary testified that he is listed as a named inventor, but Woodward is not. Obviously, our stipulation is not intended to make Woodward a named inventor. They also had different titles.

Despite these differences, we agree that the responses that O'Leary gave for any venue issue (e.g., relevance at trial, travel) are representative of the types of responses that Woodward would give, such that the Court should treat them the same for venue issues.

Peter Tong

Russ, August & Kabat

4925 Greenville Avenue, Suite 200 | Dallas, Texas 75206

Main +1 310 826 7474 | ptong@raklaw.com | www.raklaw.com

From: Jeremy Anapol <Jeremy.Anapol@knobbe.com>

Date: Tuesday, October 15, 2024 at 11:32 AM

To: Peter Tong <ptong@raklaw.com>

Cc: rak_virtamove@raklaw.com <rak_virtamove@raklaw.com>, Amazon-VirtaMove <Amazon-VirtaMove@knobbe.com>, Harper Estes <hestes@lcalawfirm.com>

Subject: RE: VirtaMove v. Amazon - Stipulation Regarding Venue Depositions

Peter,

Your email below adds a new qualification that we did not previously discuss. Amazon cannot waive the depositions of Woodward, Huffman, and Colford until you clarify what you meant by this new qualification. You said that O'Leary's deposition is representative "for any common venue declarations issue," suggesting that you think there are some issues in the declarations that are not common. Please specifically identify each issue that we deposed O'Leary about that you contend is *not* common with the other three declarants. We need to know what you think is not representative so we can evaluate your proposed revision to the previously agreed-

upon stipulation.

Thanks,
Jeremy

Jeremy Anapol

Partner

949-721-2806 Direct

Knobbe Martens

From: Peter Tong <ptong@raklaw.com>

Sent: Monday, October 14, 2024 1:49 PM

To: Jeremy Anapol <Jeremy.Anapol@knobbe.com>

Cc: rak_virtamove@raklaw.com; Amazon-VirtaMove <Amazon-VirtaMove@knobbe.com>; Harper Estes <hestes@lcalawfirm.com>

Subject: Re: VirtaMove v. Amazon - Stipulation Regarding Venue Depositions

Hi Jeremy,

More clearly, in the interest of simplifying the proceeding and conserving the resources of both parties, for purposes of the venue motion only, Mr. O'Leary's deposition is representative for any common venue declarations issue for Woodward, Huffman, and Colford. With this agreement, Amazon is waiving the right to take the depositions of Woodward, Huffman, and Colford, and VirtaMove may still rely on the venue declarations of Woodward, Huffman, and Colford.

Peter Tong

Russ, August & Kabat

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Main +1 310 826 7474 | ptong@raklaw.com | www.raklaw.com

From: Jeremy Anapol <Jeremy.Anapol@knobbe.com>

Date: Monday, October 14, 2024 at 12:33 PM

To: "ptong@raklaw.com" <ptong@raklaw.com>

Cc: "rak_virtamove@raklaw.com" <rak_virtamove@raklaw.com>, Amazon-VirtaMove <Amazon-VirtaMove@knobbe.com>, Harper Estes <hestes@lcalawfirm.com>

Subject: VirtaMove v. Amazon - Stipulation Regarding Venue Depositions

Peter,

Please confirm that VirtaMove agrees to the following stipulation:

Mr. O'Leary's deposition, which occurred on October 7, 2024, is representative for O'Leary, Woodward, Huffman, and Colford on issues pertaining to their venue

declarations only.

Thanks,
Jeremy

Jeremy Anapol
Partner
949-721-2806 Direct
Knobbe Martens

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